

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

JAMES HAYDEN,

Plaintiff,

v.

2K GAMES, INC. and TAKE-TWO
INTERACTIVE SOFTWARE, INC.,

Defendants.

CASE NO. 1:17-cv-02635-CAB

**DEFENDANTS 2K GAMES, INC. AND TAKE-TWO INTERACTIVE
SOFTWARE, INC.'S MOTION FOR LEAVE TO FILE
MOTION FOR PARTIAL SUMMARY JUDGMENT**

Defendants 2K Games, Inc. and Take-Two Interactive Software, Inc. (collectively, “Take-Two”), respectfully move this Court for an order pursuant to Federal Rule of Civil Procedure 16 and pursuant to this Court’s Order on Plaintiff’s Proposed Case Management Schedule (Dkt. 236), granting Defendants leave to file a motion for partial summary judgment on two issues (1) failure to satisfy 17 U.S.C. § 411(a)’s pre-suit registration requirement and (2) fraud on the Copyright Office. The reasons for granting this motion are more fully explained in the attached memorandum of law in support of this motion.

Dated: September 26, 2023

/s/ Dale M. Cendali

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CERTIFICATE OF SERVICE

I hereby certify that on September 26, 2023, a copy of the foregoing was filed electronically. Notice of this filing was sent by operation of the Court's Electronic Filing System to all parties indicated on the electronic filing receipt, and parties may access this filing through the Court's System.

/s/ Dale M. Cendali
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